

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IRON WORKERS' MID-AMERICA)	
PENSION PLAN, <i>et al.</i> ,)	
)	
Plaintiffs,)	CIVIL ACTION
)	
vs.)	NO. 22 C 0196
)	
VEI SOLUTIONS, INC.,)	JUDGE ELAINE E. BUCKLO
an Illinois corporation,)	
)	
TRANQUILINO R. VENTURA,)	
an individual,)	
)	
Defendants.)	

PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT

Plaintiffs, Iron Workers Mid-America Pension Plan, *et al.*, by and through their attorneys, hereby file their Motion for Summary Judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure, consistent with the briefing schedule set forth in the Court's March 17, 2022 Order. In support of their Motion, Plaintiffs are filing contemporaneously a Memorandum in Support and their Local Rule 56.1 Statement of Uncontested Material Facts and supporting documents.

Respectfully submitted,

/s/ Patrick N. Ryan

One of the Attorneys for the Plaintiffs

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CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that on this August 31, 2022, he caused to be electronically filed, **Plaintiffs' Motion for Summary Judgment**, with the Clerk of the Court using the CM/ECF system and sent a copy via First Class US Mail to the following: which will send notification of such filing to the following:

Mr. Tranquilino R. Ventura,
Individually and as Registered Agent for
VEI Solutions, Inc.
1800 Howard Street, Suite A
Elk Grove Village, IL 60007-2482

And

1225 W. Morse Ave., # 406
Chicago, IL 60626

/s/ Patrick N. Ryan

Names and Address of Attorneys for the Plaintiffs:

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